



South San Joaquin Irrigation District

Response to

**STATE WATER RESOURCES CONTROL BOARD'S
DRAFT SUBSTITUTE ENVIRONMENTAL DOCUMENT
IN SUPPORT OF
POTENTIAL CHANGES TO THE WATER QUALITY CONTROL PLAN FOR
THE SAN FRANCISCO BAY-SACRAMENTO/SAN JOAQUIN DELTA ESTUARY:
SAN JOAQUIN RIVER FLOWS AND SOUTHERN DELTA WATER QUALITY.**

March 21, 2013

Agriculture in SSJID service area

- 55,952 acres of irrigated crops.
- 28,000 acres in almonds with much of the remainder in other trees (walnuts, cherries), vines and other permanent crops. These crops can't be fallowed.
- The ground dedicated to feed crops, including pasture, oats, corn, clover, etc. is necessary to support the local dairy industry. Supplemental feed prices are already devastating dairies.
- Increasing levels of salinity in groundwater is resulting in growers who historically relied on groundwater now converting to SSJID surface water.

Nick C. DeGroot Water Treatment Plant

- Project participants include the cities of Tracy, Lathrop, Manteca and Escalon. The cities are entitled to receive a combined total allotment of 43,090 acre-feet annually.
- City of Ripon has a contract right to receive up to 6,000 acre-feet annually of raw water in-lieu of treated water.
- This treated water serves approximately 193,000 residents in addition to the industry and businesses in these cities.
- Tracy is seeking an increase in its allocation. Ripon is seeking to reduce their reliance on groundwater and increase surface water supplies.

Cities options limited

- Each of the cities that receives water from SSJID's WTP also pump groundwater.
- In order to meet CDPH standards, these cities are increasingly turning to SSJID surface water to blend with groundwater.
- As PG&E imposes peak hour electric pricing on the cities and farmers, pressure will increase to convert from pumping to surface water.

Eastern San Joaquin County Sub-basin

- San Joaquin County Groundwater basin has an estimated overdraft of 70,000 acre-feet per year and is declining at approximately 2 feet per year with some areas declining as much as 10 feet in 2012.
- Surface irrigation in SSJID's service area contributes a net 57,000 acre-feet per year to the groundwater basin.

Groundwater

- SSJID contributes approximately 29,000 acre-feet annually to the groundwater basin through seepage at Woodward Reservoir.
- Woodward Reservoir: 35,000 acre-feet off-stream storage. Year around recreation including fishing, hunting, skiing, camping and more is managed by Stanislaus County Department of Parks and Recreation. The revenues from this activity meets approximately 35% of the entire Stanislaus Parks & Rec annual budget.
- With SWRCB imposed limits on diversions, Woodward can be operated with reduced storage to minimize seepage and/or groundwater recharge losses.



Lost generation

- SSJID owns two small hydro generation facilities at Woodward Reservoir; Frankenheimer Power House (5.04MW) and Woodward Power House (2.90MW). If we had to run our diversions straight through Woodward Reservoir, we would lose some of this generation.

Stewardship Responsibility

- As beneficiaries of pre-1914 adjudicated water rights, SSJID acknowledges the Public's interest in protecting the biological integrity of the Stanislaus River.
- To that end, SSJID & OID invest over \$1 Million annually to develop a base of scientific knowledge of the impacts effecting that biological integrity.
- SSJID and OID also have invested millions of additional dollars in irrigation efficiency and habitat improvement projects.

SHOW ME THE SCIENCE

- The SED is shamefully deficient of credible science to support the proposal. It ignores the information developed by the Districts over the years that the increased flows will not cause measurable habitat improvements. In fact, the SED acknowledges the additional water will NOT result in benefits to native fish and, in fact, may actually harm those populations.
- The SWRCB must stop the ideological circus and get serious about saving the species.